

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS JEFFREY SWANSON,

Defendant.

Case:2:21-cr-20322
Judge: Michelson, Laurie J.
MJ: Altman, Kimberly G.
Filed: 05-12-2021 At 04:03 PM
INDI USA V. SWANSON (DA)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
ATTEMPTED SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

On or about November 30, 2019, in the Eastern District of Michigan, the defendant, THOMAS JEFFREY SWANSON, knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was

transported using any means and facility of interstate and foreign commerce, in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT TWO
ATTEMPTED SEXUAL EXPLOITATION OF CHILDREN
(18 U.S.C. §§ 2251(a) and (e))

Beginning on June 15, 2020 and continuing until at least June 22, 2020, in the Eastern District of Michigan, the defendant, THOMAS JEFFREY SWANSON, knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported using any means and facility of interstate and foreign commerce, in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT THREE
RECEIPT OF CHILD PORNOGRAPHY
(18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1))

On or about November 24, 2019, in the Eastern District of Michigan, THOMAS JEFFREY SWANSON knowingly received material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), that the child pornography had been mailed, shipped, and transported using a means and facility

of interstate and foreign commerce, including a computer; and that the child pornography was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer.

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

Upon conviction of counts one, two and/or count three alleged in this Indictment, THOMAS JEFFREY SWANSON, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;

- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

MATTHEW A. ROTH
Chief, Major Crimes Unit
Assistant United States Attorney

s/Christopher W. Rawsthorne
CHRISTOPHER W. RAWSTHORNE
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Dated: May 12, 2021

Case:2:21-cr-20322

Judge: Michelson, Laurie J.

MJ: Altman, Kimberly G.

Filed: 05-12-2021 At 04:03 PM

INDI USA V. SWANSON (DA)

United States District Court
Eastern District of Michigan**Criminal Case Cov**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>CWR</i>

Case Title: USA v. THOMAS JEFFREY SWANSONCounty where offense occurred : MacombCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty Indictment/ Information --- no prior complaint.✓ Indictment/ Information --- based upon prior complaint [Case number: 21-mj-30164] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 12, 2021

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.